

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**MOTION TO SHORTEN NOTICE ON THE  
ADDITIONAL TORT CLAIMANTS COMMITTEE OF SEXUAL  
ABUSE SURVIVORS' MOTION FOR AN ORDER PURSUANT TO  
BANKRUPTCY RULE 2004 DIRECTING PRODUCTION OF DOCUMENTS  
AND MATERIALS FROM THE UNITED STATES OLYMPIC COMMITTEE**

The Additional Tort Claimants Committee of Sexual Abuse Survivors (the “Sexual Abuse Survivors’ Committee”), appointed in this case under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), hereby submits this motion for the entry of an order, pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and S.D.Ind. B-9006-1, shortening the notice period on *The Additional Tort Claimants Committee of Sexual Abuse Survivors’ Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* (the “2004 Exam Motion”) [Doc 433] on the following grounds:

1. The Sexual Abuse Survivors’ Committee has contemporaneously filed herewith the 2004 Exam Motion requesting entry of an order authorizing the Sexual Abuse Survivors’ Committee to issue the Subpoena<sup>2</sup> to the USOC compelling the production of the documents as set forth in the Subpoena.

---

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

<sup>2</sup> Capitalized terms used but not otherwise defined in this motion have the meanings used in the 2004 Exam Motion.

2. The Sexual Abuse Survivors' Committee, USAG and its insurers are in discussions to move forward with a mediation process. The Sexual Abuse Survivors' Committee needs the information requested in the 2004 Exam Motion in order to properly prepare for such mediation.

3. In order to avoid unnecessary delay of the mediation, the Sexual Abuse Survivors' Committee requests that the 2004 Exam Motion be heard at the omnibus hearing scheduled for May 15, 2019, requiring the Court to shorten notice on the 2004 Exam Motion. Counsel to the USOC, Dianne F. Coffino, has consented to such request and the parties have agreed to shorten notice to seventeen (17) days, setting the objection deadline for Monday, May 13, 2019 at 9:00 a.m. (prevailing Eastern time).

**WHEREFORE**, the Sexual Abuse Survivors' Committee respectfully requests entry of an order, pursuant to Bankruptcy Rule 9006(c) and S.D.Ind. B-9006-1: (i) shortening the notice period for 2004 Exam Motion to seventeen (17) days, setting the objection deadline for Monday, May 13, 2019 at 9:00 a.m. (prevailing Eastern time); (ii) setting the 2004 Exam Motion for the omnibus hearing on May 15, 2019 at 1:30 p.m. (prevailing Eastern time); and (iii) granting such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

Dated: April 26, 2019

/s/ James I. Stang

---

James I. Stang, Esq. (admitted *pro hac vice*)

Ilan D. Scharf, Esq. (admitted *pro hac vice*)

Joshua M. Fried, Esq.

Steven W. Golden, Esq. (admitted *pro hac vice*)

10100 Santa Monica Blvd., 13th Floor

Los Angeles, CA 90067-4003

Telephone: (310) 277-6910

Facsimile: (310) 201-0760

E-mail: jstang@pszjlaw.com

isharf@pszjlaw.com

jfried@pszjlaw.com

sgolden@pszjlaw.com

-and-

RUBIN & LEVIN, P.C.

/s/ Meredith R. Theisen

---

Meredith R. Theisen, Esq.

Deborah J. Caruso, Esq.

135 N. Pennsylvania Street, Suite 1400

Indianapolis, IN 46204

Telephone: (317) 634-0300

Facsimile: (317) 263-9411

Email: dcaruso@rubin-levin.net

mtheisen@rubin-levin.net

*Counsel for the Sexual Abuse Survivors' Committee*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2019, a copy of the foregoing *Motion to Shorten Notice on The Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

Nancy D Adams    ndadams@mintz.com  
Steven Baldwin    sbaldwin@psrb.com, rmatthews@psrb.com  
Martin Beeler    mbeeler@cov.com  
Daniel D. Bobilya    dan@b-blegal.com, sarah@b-blegal.com  
Tonya J. Bond    tbond@psrb.com, jscabee@psrb.com  
Wendy D Brewer    wbrewer@fmdlegal.com, cbellner@fmdlegal.com  
Kenneth H. Brown    kbrown@pszjlaw.com  
Charles D. Bullock    cbullock@sbplclaw.com, lhaas@sbplclaw.com  
George Calhoun    george@ifrahlaw.com, Heather.Simpson@kennedyscmk.com  
John Cannizzaro    john.cannizzaro@icemiller.com, Thyrza.Skofield@icemiller.com  
Deborah Caruso    dcaruso@rubin-levin.net, dwright@rubin-levin.net;jkrichbaum@rubin-levin.net;atty\_dcaruso@bluestylus.com  
Dianne Coffino    dcoffino@cov.com  
Alex Cunny    acunny@manlystewart.com  
Edward DeVries    edward.devries@wilsonelser.com  
Karen M Dixon    kdixon@skarzynski.com  
Laura A DuVall    Laura.Duvall@usdoj.gov, Catherine.henderson@usdoj.gov  
Jeffrey B. Fecht    jfecht@rbelaw.com, rmccintic@rbelaw.com  
Sarah Lynn Fowler    sarah.fowler@mbcblaw.com, deidre.gastenveld@mbcblaw.com  
Eric D Freed    efreed@cozen.com, mmerola@cozen.com  
Cameron Getto    cgetto@zacfirm.com  
Steven W Golden    sgolden@pszjlaw.com  
Gregory Michael Gotwald    ggotwald@psrb.com, scox@psrb.com  
Manvir Singh Grewal    mgrewal@4grewal.com  
Susan N Gummow    sgummow@fgppr.com, bcastillo@fgppr.com  
Katherine Hance    khance@goodwin.com  
Jeffrey M. Hester    jhester@hbkfirm.com, mhetser@hbkfirm.com  
Samuel D. Hodson    shodson@taftlaw.com, aolave@taftlaw.com  
Jeffrey A Hokanson    jeff.hokanson@icemiller.com, bgnotices@icemiller.com  
John R. Humphrey    jhumphrey@taftlaw.com, aolave@taftlaw.com  
Cassandra Jones    cjones@wwmlawyers.com, vhosek@wwmlawyers.com  
Bruce L. Kamplain    bkamplain@ncs-law.com, dhert@ncs-law.com;klong@ncs-law.com  
Kevin P Kamraczewski    kevin@kevinklax.com  
Ronald David Kent    ronald.kent@dentons.com  
Adam L. Kochenderfer    akochenderfer@wolfsonbolton.com  
Christopher Kozak    ckozak@psrb.com  
Carl N. Kunz    ckunz@morrisjames.com, jdawson@morrisjames.com  
Cynthia Lasher    clasher@ncs-law.com, dcouch@ncs-law.com;dhert@ncs-law.com

Martha R. Lehman mlehman@salawus.com,  
marthalehman87@gmail.com;pdidandeh@salawus.com;lengle@salawus.com  
Michael M. Marick mmarick@skarzynski.com  
Phillip Alan Martin pmartin@fmdlegal.com, cbellner@fmhd.com  
John McDonald jmcdonald@briggs.com  
Mathilda S. McGee-Tubb msmcgee-tubb@mintz.com  
Harley K Means hkm@kgrlaw.com, kwhigham@kgrlaw.com;cjs@kgrlaw.com  
Geoffrey M. Miller geoffrey.miller@dentons.com, ndil\_ecf@dentons.com  
Robert Millner robert.millner@dentons.com, ndil\_ecf@dentons.com  
James P Moloy jmoloy@boselaw.com,  
dlingenfelter@boselaw.com;mwakefield@boselaw.com  
Ronald J. Moore Ronald.Moore@usdoj.gov  
Whitney L Mosby wmosby@bgdlegal.com, fwolfe@bgdlegal.com  
Joel H. Norton jnorton@rsslawoffices.com  
Michael P. O'Neil moneil@taftlaw.com, aolave@taftlaw.com  
Weston Erick Overturf wes.overturf@mbcblaw.com,  
deidre.gastenveld@mbcblaw.com;ellen.sauter@mbcblaw.com  
Dean Panos dpanos@jenner.com  
Stephen Jay Peters speters@kgrlaw.com, acooper@kgrlaw.com  
Ginny L. Peterson gpeterson@k-glaw.com, acoy@k-glaw.com  
John Thomas Piggins pigginsj@millerjohnson.com, ecfpigginsj@millerjohnson.com  
George Plews gplews@psrb.com  
Amanda Koziura Quick amanda.quick@atg.in.gov,  
Darlene.Greenley@atg.in.gov;Hunter.Schubert@atg.in.gov  
Michael L. Ralph mralph@rsslawoffices.com  
Abigail E. Rocap arocap@batescarey.com  
Melissa M. Root mroot@jenner.com, wwilliams@jenner.com  
James Pio Ruggeri jruggeri@goodwin.com  
Syed Ali Saeed ali@sllawfirm.com, betty@sllawfirm.com  
Ilan D Scharf ischarf@pszjlaw.com  
Thomas C Scherer tscherer@bgdlegal.com, fwolfe@bgdlegal.com  
David J. Schwab djschwab@rsslawoffices.com  
Igor Shleypak ishleypak@fgppr.com, jfecteau@fgppr.com  
Casey Ray Stafford cstafford@k-glaw.com, lsmith@k-glaw.com  
James I. Stang jstang@pszjlaw.com  
Catherine L. Steege csteege@jenner.com, mhinds@jenner.com;thooker@jenner.com  
Laura B. Stephens lbstephens@mintz.com  
Meredith R. Theisen mtheisen@rubin-levin.net,  
atty\_mtheisen@bluestylus.com;mralfp@rubin-levin.net  
U.S. Trustee ustpregion10.in.ecf@usdoj.gov  
Susan Walker susan.walker@dentons.com  
Joshua D Weinberg jweinberg@goodwin.com  
Mark R. Wenzel mwenzel@salawus.com, pdidandeh@salawus.com  
Gabriella B. Zahn-Bielski gzahnbielski@cov.com

I further certify that on April 26, 2019, a copy of the foregoing *Motion to Shorten Notice on The Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order*

*Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* was served via electronic mail to the following:

**United States Olympic Committee:** Chris McCleary at Chris.McCleary@usoc.org

**The Alexander, a Dolce Hotel and Wyndham Hotel Group, LLC:** Daniel M. Eliades at daniel.eliades@klgates.com and David S. Catuogno at david.catuogno@klgates.com

/s/ Meredith R. Theisen

Meredith R. Theisen

f:\wp80\genlit\usa gymnastics-86756901\drafts\motion short 2004 exam usoc.docx